

IN THE UNITED STATES DISTRICT COURT,  
NORTHERN DISTRICT OF ILLINOIS

FRANKLIN, SAMUEL (K-60141),	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
CORRECTIONS OFFICER CUNNINGHAM,	)	Case No. 07 C 6415
	)	
Defendant.	)	
	)	
	)	
	)	
	)	

**PLAINTIFF SAMUEL FRANKLIN'S MOTION FOR EXTENSION OF TIME**

NOW COMES Plaintiff, SAMUEL FRANKLIN ("Franklin"), by and through his attorneys, Tressler Soderstrom Maloney & Priess, LLP, and he hereby requests that this Court enter an Order extending the time in which to file a Second Amended Complaint, and in support thereof, states the following:

1. On November 13, 2007, Franklin filed his Complaint and Motion for Leave to File *In Forma Pauperis*.
2. On November 19, 2007, this Court granted Franklin's Motion for Leave to File *In Forma Pauperis*, and dismissed the Complaint without prejudice.
3. On December 21, 2007, Franklin filed an Amended Complaint.
4. On January 17, 2008, this Court appointed Todd S. Schenk, of Tressler Soderstrom Maloney & Priess, LLP, to represent Franklin under District Court Local Rules 83.11(g) and 83.37.
5. On January 17, 2008, Franklin's Amended Complaint was dismissed without prejudice to appointed counsel filing a second amended complaint within 60 days if the second

amended complaint comports with counsel's obligations under Rule 11 of the Federal Rules of Civil Procedure.

6. Undersigned counsel is currently in the midst of an initial fact investigation, and has requested numerous documents from the Cook County Department of Corrections. Some of these documents have been received, but many of those requested documents were not produced, and are currently being sought.

7. Franklin's counsel has scheduled an initial interview with Franklin for Friday, March 15, 2008.

8. As a result, undersigned counsel has not completed his initial investigation, and thus seeks an additional 60 days, until May 16, 2008, to file a Second Amended Complaint, if deemed proper under Rule 11.

WHEREFORE, Plaintiff Franklin respectfully requests that this Court issue an Order extending the time in which to file Franklin's Second Amended Complaint to May 16, 2008.

**SAMUEL FRANKLIN**

By: \_\_\_\_\_  
One of His Attorneys

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